

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

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JAMES M. BAKER, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00272-GMS  
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: CLASS ACTION  
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ROCHELLE PHILLIPS, On Behalf of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00277-GMS  
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: CLASS ACTION  
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ROBERT WILKINS, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00287-GMS  
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: CLASS ACTION  
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CLASS ACTION

CLASS ACTION

CLASS ACTION

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MICHAEL D. BLUM, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00372-GMS  
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: CLASS ACTION  
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**STIPULATION AND ORDER**

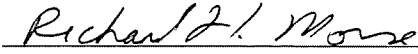
**WHEREAS** putative class member Activist Investmentgesellschaft mbH for account of the PT-Master fund, represented by the law firm of Milberg Weiss Bershad & Schulman LLP, has filed a motion for consolidation of the above-referenced actions, for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, and

**WHEREAS** said motion is unopposed as of the date below,

**IT IS HEREBY STIPULATED AND AGREED**, by and between undersigned counsel for the parties herein and subject to the Order of this Court, that (i) Lead Plaintiff will serve a consolidated amended complaint no later than 60 days after a decision is entered on the pending motions for appointment of Lead Plaintiff and approval of Lead Counsel, (ii) Defendants' answers to or motions to dismiss the consolidated amended complaint will be served no later than 60 days after the consolidated amended complaint is served, (iii) in the event that a motion to dismiss is made by one or more Defendants, Lead Plaintiff will have 60 days to file its answering

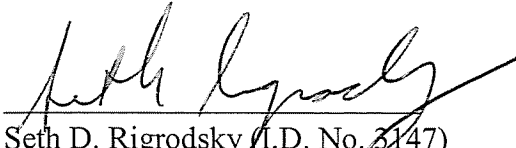
brief in response to such motion to dismiss and the moving Defendant or Defendants will have 45 days to submit their reply.

September 12, 2005

  
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*Attorneys for Plaintiffs James M. Baker, Leonard Bronstein, Robert Wilkins, Greg Penn,  
and Michael D. Blum*

SO ORDERED, this \_\_\_\_ day of September, 2005

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United States District Judge